

REMARKS

Claims remaining in the present patent application are numbered 1-26. The rejections and comments of the Examiner set forth in the Office Action dated July 12, 2005 have been carefully considered by the Applicants. Applicants respectfully request the Examiner to consider and allow the remaining claims.

35 U.S.C. §102 Rejection

The present Office Action rejected Claims 1, 3-15, 18, and 20-26 under 35 U.S.C. 102(a) as being anticipated by Jeong et al. ("Induction of Integrated View for XML Data with heterogeneous DTDs", CIKM '01, Nov. 5-10, 2001, ACM 1-581 (13-436-3/01/0011), pp. 151-158, hereafter referred to as "Jeong et al."). Applicants have reviewed the above cited references and respectfully submit that the present invention as recited in Claims 1, 3-15, 18, and 20-26, is neither anticipated nor rendered obvious by the Jeong et al. reference.

Independent Claims 1, 10 and 18

Applicants respectfully point out that independent Claim 1, 13 and 19 each recite that the present invention includes methods for document transformation.

Specifically, independent Claims 1 and 18, each recite, in part:

[A] method of document transformation comprising:
a) modeling a source XML document corresponding to a source schema as a source tree having a plurality of source nodes;
b) modeling a target XML document corresponding to a target schema as a target tree having a plurality of target nodes; and
c) generating a sequence of transformation operations that transforms said source tree to said target tree.

Additionally, independent Claim 10 recites, in part:

[A]method of document transformation comprising:
a) modeling a source schema of XML and a target schema of XML as a tree structure creating a source tree and a target tree, said source tree having a plurality of source nodes, said target tree having a plurality of target nodes; and
b) generating a sequence of transformation operations that transforms said source XML document to said target XML document, wherein said plurality of source nodes of said source schema are matched and transformed to said plurality of target nodes in said target schema.

The present invention pertains to methods and systems for document transformation between a source XML schema and a target XML schema. In particular, independent Claims 1, 10, and 18 recite that a sequence of transformation operations are generated that transforms a source tree representing a source XML document to a target tree

representing a target XML document, or transforming a source XML document to a target XML document.

Applicants respectfully note that the use of the prior art reference, Jeong et al., is improper for teaching or suggesting the present methods for document transformation between a source XML schema and a target XML schema, as claimed in independent Claims 1, 10, and 18 of the present invention. Specifically, Applicants hereby respectfully assert that the Jeong et al. reference can be antedated under 37 CFR 1.131 and is disqualified as prior art under 102(a). In particular, Applicants respectfully assert that the present invention was reduced to practice prior to the effective date of the prior art reference.

Applicants respectfully note that the prior art reference to Jeong is a printed publication described in this or a foreign country before the invention thereof by the Applicants for patent. **The earliest effective filing date of the Jeong et al. reference November 5, 2001.**

Applicants respectfully assert that the present invention was reduced to practice prior to the effective date of the reference. That is, the present invention was reduced to practice prior to November 5, 2001. Declarations from all the inventors attesting to these

facts are being filed concurrently with the instant response.

Specifically, a copy of the paper entitled, "Automating the Transformation of XML Documents," hereinafter referred to as "the Transformation Paper," is offered as Exhibit A in each of the declarations by the inventors. The authors of the paper include Hong Su, Harumi Kuno, and Elke A. Rundensteiner, all inventors of the present invention.

The Transformation Paper is directed to the discovery of transformation operations between two XML schemas of the present Application. Exhibit A demonstrates that the present invention was reduced to practice.

Additionally, each of the declarations of the inventors attest to the fact that the creation of the Transformation Paper entitled, "Automating the Transformation of XML Documents," occurred prior to November 5, 2001.

Accordingly, the present invention as recited in Claims 1, 10, and 18 is neither anticipated nor rendered obvious by the now disqualified Jeong et al. reference.

As such, the present invention as recited in Claims 1, 10, and 18 is neither anticipated nor rendered obvious by the Jeong et al. reference and is in a condition for allowance. In addition, Applicants respectfully submit that Claims 2-9 which depend from independent Claim 1 are also in a condition for allowance as being dependent on an allowable base claim. Also, Applicants respectfully submit that Claims 11-17 which depend from independent Claim 10 are also in a condition for allowance as being dependent on an allowable base claim. Further, Applicants respectfully submit that Claims 19-26 which depend from independent Claim 18 are also in a condition for allowance as being dependent on an allowable base claim.

35 U.S.C. §103 Rejection

The present Office Action rejected Claims 2, 17, and 19 under 35 U.S.C. 103(a) as being unpatentable over Jeong et al. in view of Geiger (U.S. Patent Application Publication No. 2002/0112048). Also, Claim 16 is rejected under 35 U.S.C. 103(a) as being unpatentable over Jeong et al. in view of the "Oracle 9i XML Reference, Release 1 (9.0.1)" (Part No. A88899-01, Oracle Corp., Redwood city, CA, June 2001, pp. i to x and 1-30 to 1-33).

Applicants have reviewed the above cited references and respectfully submit that the present invention as recited in Claims 2, 17, 16, and 19 is neither anticipated nor

rendered obvious by the Jeong et al. reference taken alone or in combination with the Geiger et al., and Oracle 9i XML references.

Applicants respectfully submit that the present invention as disclosed in dependent Claims 2, 17, 16, and 19 are not anticipated by the Jeong et al. reference, taken alone or in combination with the Geiger et al., and Oracle 9i XML references since they depend on allowable base Claims 1, 10, and 18, as previously discussed. As such, dependent Claims 2, 17, 16, and 19 are in a condition for allowance as being dependent on allowable base claims, 1, 10, and 18.

CONCLUSION

In light of the amendments and arguments presented herein, Applicants respectfully request reconsideration of the rejected Claims for allowance thereof.


Based on the arguments presented above, Applicants respectfully assert that Claims 1-26 overcome the rejections of record. Therefore, Applicants respectfully solicit allowance of these Claims.

The Examiner is invited to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Respectfully submitted,

Wagner, Murabito & Hao LLP

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John P. Wagner Jr.
Reg. No.: 35,398
Two North Market Street
Third Floor
San Jose, California 95113